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9		C DICTRICT COLIDT	
10	UNITED STATE	S DISTRICT COURT	
11	DISTRICT OF	F ARIZONA	
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13	Ondrea Snyder, Plaintiff,	Case #	
14	Tranium,	Case #	
	V.	COMPLAINT AND DEMAND FOR JURY TRIAL	
15	Prescott Healthcare Solutions, LLC,	JUNITAL	
16	d/b/a Optima Medical		
17			
18	Defendant.		
19			
20	Plaintiff Ondrea Snyder by and through Elizabeth D. Tate, her undersigned		
21	attorney of record, submit this Complaint for	relief and Demand for Jury Trial pursuant	
22	to Federal Rules of Civil Procedure ("FRCP")	, Rules 3, 7(a)1, 8(a), and 38(a, b).	
23			
24	1. Plaintiff's	8 5 Claims	
25	Count One: 42 U.S.C. 1981 Retaliation	for Having Protested Race Discrimination	
26	Count Two: 42 U.S.C. 1981 – Race Dis	scrimination in Employment.	
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Count Three: Title VII 42 U.S.C. § 2000 e Race Discrimination in	
Employment.	
Count Four: Title VII 42 U.S.C. § 2000-3(a) Retaliation for Having Protested	
Race Discrimination.	
Race Discrimination.	
Count Five: ADEA 29 U.S.C. § 623 Age Discrimination in Employment.	
2. The Parties, Jurisdiction and Venue	
1. At all times material to this Complaint, the Plaintiff, Ondrea Snyder	
("Nurse Snyder") and has been:	
(A) an adult resident of Maricopa County, Arizona; and	
(B) employed by the Defendant, Prescott Healthcare Solutions, LLC, d/b/a Optima	
Medical as nurse practitioner.	
(C) a person whose race is African American, and age is over 40.	
(D) a person who is qualified to perform her job as nurse practitioner.	
2. Defendant Prescott Healthcare Solutions, LLC, d/b/a Optima Medical,	
"Optima" has been at all times material to this Complaint:	
(A) a domestic for-profit corporation with ten medical offices in various cities in	
the State of Arizona	
(B) providing primary care healthcare utilizing physician assistants and nurse	
practitioners to service its patients.	
(C) the "employer" of Nurse Snyder.	
3. All events alleged herein occurred within the State of Arizona.	
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1	4. This Court has personal jurisdiction over the parties based upon the foregoing	
2	facts.	
3	5. This Court has subject matter jurisdiction for the five claims herein because all	
4 5	arise from federal statutes, 28 U.S.C. 1331, and as provided by 28 U.S.C. 1343(a)(3,4).	
6	6. This Court (Phoenix Division) is the proper venue for this action pursuant to 28	
7	U.S.C. 1391(b) (1, 2).	
8	3. General Fact Allegations	
9 10	7. Optime hired Nurse Snyder on or about June 3, 2019, as a nurse	
11	practitioner.	
12	8. Nurse Snyder has 30 years of experience as a nurse and performed her job	
13	well, receiving praise from her employer and patients alike. Optima recognized Nurse	
14 15	Snyder's achievement and designated Nurse Snyder as a "top performer."	
16	9. Nurse Snyder is the only African American nurse practitioner for Optima.	
17	Optima assigned Nurse Snyder to its Peoria officer where Christy Graham was office	
18	manager. Ms. Graham did not like Nurse Snyder because of her race and would say	
<ul><li>19</li><li>20</li></ul>	racially insulting things to Nurse Snyder like, "Black don't crack" and "You seem to	
21	have all these Black children in your house everyday eating you out of house and home."	
22	10. Ms. Graham would also discriminate against Nurse Snyder for her race and	
23	age by assigning Nurse Snyder a heavier caseload than Nurse Snyder's younger,	
<ul><li>24</li><li>25</li></ul>	Caucasian, colleague, Katherine DeGimano, in addition to making the racially derogatory	
26	comments to Nurse Snyder. Ms. Graham treated Nurse DeGimano more favorably than	
27	3	

1	Nurse Snyder by assigning Nurse DeGimano a lighter caseload because Nurse DeGimano
2	is Caucasian and younger than Nurse Snyder.
3	11. Additionally, when Nurse Snyder asked for FMLA, Ms. Graham denied Nurse
4 5	Snyder FMLA but treated a younger Latina nurse more favorably by granting the Latina
6	nurse FMLA when the Latina nurse did not even qualify for FMLA.
7	11. Nurse Snyder did not like Ms. Graham's racially derogatory comments and
8	preferential treatment based on age and race that Ms. Graham conferred upon Nurse
9 10	DeGimano and the Latina nurse. So, in December of 2020, Nurse Snyder complained to
11	Mike O'Neil, Caucasian and in his 40s, about the situation.
12	12. On January 13, 2021, Nurse Snyder made a formal complaint about Ms.
13	Graham's discriminating against her for race and age to Katherine Ferrer, Caucasian in her
14 15	20s, and head of HR. When Ms. Graham found out that Nurse Snyder reported her to
16	Ms. Ferrer in HR, Ms. Graham told Nurse Snyder, "You're done here!" and subjected
17	Nurse Snyder to adverse action by terminating Nurse Snyder.
18	13. When Nurse Snyder protested Ms. Graham terminating her, Ms. Ferrer
19	informed Nurse Snyder that Ms. Graham did not have the authority to fire Nurse Snyder
20	and told Nurse Snyder to come back to work. So, Nurse Snyder went back to work.
21	
22	14. When Nurse Snyder came back to work, Ms. Graham was angry with her for
23	protesting discrimination. On January 19, 2021, Ms. Graham subjected Nurse Snyder
<ul><li>24</li><li>25</li></ul>	to another adverse action and retaliated against Nurse Snyder by moving Nurse Snyder's
26	office to a hazardous storage closet with a circuit breaker box that emanated EMF
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1	radiation. Ms. Graham's adverse actions against Nurse Snyder were causally linked to	
2	Nurse Snyder protesting discrimination.	
3	15. Nurse Snyder did not consent nor was she ever consulted or advised that	
4	Ms. Graham was going to move her office to the hazardous storage closet. Nurse Snyder	
5	reported Ms. Graham the office was moved but no action was taken against Ms. Graham	
7	for retaliating against Nurse Snyder. Instead, Nurse Snyder was asked to transfer to	
8	another office, but Optima never transferred Nurse Snyder and the discrimination	
9	·	
10	continued.	
11	16. Finally, on March 26, 2021, Nurse Snyder could no longer tolerate the	
12	discrimination and hostility and was constructively terminated because Optima refused	
13	to remediate the hostility and discrimination that Nurse Snyder experienced.	
14	17. Optima's discriminatory hiring decisions overall oppression of Nurse Snyder	
<ul><li>15</li><li>16</li></ul>	took a toll on her health As a direct and proximate result of the conduct described	
17	above by Optima, Nurse Snyder has suffered damages including loss of self-esteem,	
18	having to worry about being treated unfairly daily, oppression and harassment.	
19	20. The conduct of Optima alleged herein with respect to Nurse Snyder was done	
20		
21	with a deliberate and malicious intent to discriminate against him in violation of federal	
22	statutes including, inter alia 42 U.S.C. 1981 and Title VII because of her race and age	
23	and treating her disparately as alleged herein. Therefore, Nurse Snyder should be	
24	awarded, inter alia, punitive damages.	
25	4. Demand for Jury Trial	
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1	Plaintiff demands a trial by jury pursuant to the Seventh Amendment to the United
2	States Constitution, and FRCP Rule 38(a, b).
3	5. Requested Relief
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6	Count One: 42 USC 1981- Retaliation for Having Protested Race Discrimination.
7	1. Compensatory and general damages in an amount to be determined by the trier-
8	of-fact
9	2. Punitive damages in an amount to be determined by the trier of fact
10	
11	3. Her reasonable attorney's fees and expert fees incurred herein, pursuant to 42
12	U.S.C. 1988 (b) (c), FRCP Rule 54(d) (2), and LRCiv Rule 54.2.
13	4. Her taxable costs incurred herein, pursuant to FRCP Rule 54(d) (1), LRCiv
14	Rule 54.1, and 28 U.S.C. 1920.
15	Count Two: 42 USC 1981-Race Discrimination in Employment
16	Count 1 wo. 42 OSC 1981-Race Discrimination in Employment
17	
18	1. Compensatory and general damages in an amount to be determined by the trier-
19	of-fact
20	2. Punitive damages in an amount to be determined by the trier of fact
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22	3. His reasonable attorney's fees and expert fees incurred herein, pursuant to 42
23	U.S.C. 1988 (b) (c), FRCP Rule 54(d) (2), and LRCiv Rule 54.2.
24	4. His taxable costs incurred herein, pursuant to FRCP Rule 54(d)
25	Count Three: Title VII Retaliation for Having Protested Race Discrimination
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1	Compensatory and general damages in an amount to be determined by the trier-of-fact.
2	2. Punitive damages in an amount to be determined by the trier of fact
3	3. Her reasonable attorney's fees and expert fees incurred herein, pursuant to 42
4	U.S.C. 1988 (b) (c), FRCP Rule 54(d) (2), and LRCiv Rule 54.2.
5	4. Her taxable costs incurred herein, pursuant to FRCP Rule 54(d)
6	Count Four: Title VII Race Discrimination
7 8	
9	Compensatory and general damages in an amount to be determined by the trier-of-fact.
10	2. Punitive damages in an amount to be determined by the trier of fact
11	3. Her reasonable attorney's fees and expert fees incurred herein, pursuant to 42
12	U.S.C. 1988 (b) (c), FRCP Rule 54(d) (2), and LRCiv Rule 54.2.
13	4. Her taxable costs incurred herein, pursuant to FRCP Rule 54(d)
14	Count Five: Age Discrimination in Employment 29 U.S.C. § 623.
15	Liquidated damages in an amount to be determined by the trier-of-fact.
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17	2. Her reasonable attorney's fees and expert fees incurred herein, pursuant to 42
18	U.S.C. 1988 (b) (c), FRCP Rule 54(d) (2), and LRCiv Rule 54.2.
19	3. Her taxable costs incurred herein, pursuant to FRCP Rule 54(d).
20	Respectfully submitted this May 22, 2023.
21	Respectivity sublintied this May 22, 2023.
22	/s/ Elizabeth D. Tate
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24	Elizabeth D. Tate
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